Exhibit

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	Page 1
1	UNITED STATES DISTRICT COURT
	SOUTHERN DISTRICT OF INDIANA
2	
3	CASE NO.: 1:24-cv-00779-JPH-MKK
4	MAX MINDS, LLC,
5	
6	Plaintiff,
7	vs.
8	TRIANGLE EXPERIENCE GROUP, INC., INC.,
	ROBERT EDWARD CLARE, JEFFREY MASE,
9	KEVIN G. MULLICAN AND JOHN DOES 1-10,
10	
	Defendants.
11	/
12	REMOTE VIA ZOOM DEPOSITION OF JEFFREY MASE
13	TAKEN ON BEHALF OF THE PLAINTIFF
14	Remote Via Zoom
	December 4, 2024
15	10:00 a.m. to 11:59 p.m.
16	
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18	
19	REPORTED BY
	MARLA SCHREIBER, COURT REPORTER
20	NOTARY PUBLIC, STATE OF FLORIDA
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1	requirement.
2	BY MR. ROTHMAN:
3	Q Okay.
4	A Over the course of our relationship, these
5	requirements have been in constant flux.
6	Q Okay. Well, does this certification
7	agreement set forth certain requirements under now
8	therefore numbers one, two, three, does set forth
9	certain requirements concerning the transfer of source
10	code?
11	MR. DELANEY: Objection to the form.
12	BY MR. ROTHMAN:
13	Q You can answer.
14	A That's what it appears to be.
15	Q Okay. And you were aware that there were
16	requirements that TEG was supposed to follow concerning
17	source code transfers?
18	A Yes, there were a number of conditions over
19	a period of a couple of years, yes.
20	Q Okay. So there may or may not be a
21	document there marked Exhibit 35, but I tend to think
22	no. But let me share my screen so you can see the
23	document that I am going to refer to.
24	So do you see the top half of this document
25	called Evidence/Property Custody Document, Exhibit 35?

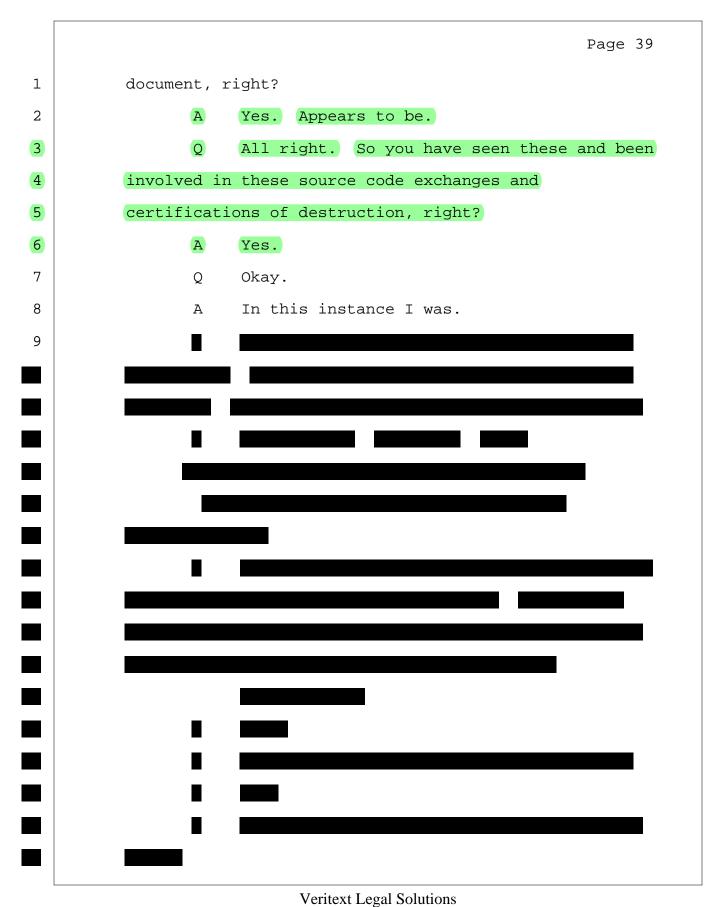
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1	Mr. Bowers certified?
2	A I do not. I wasn't involved in that
3	process.
4	Q Do you know if TEG ever retained source
5	code that it received from my client that it
6	simultaneously or subsequently thereafter certified
7	that it had destroyed?
8	A I do not. Can you repeat that question?
9	Q Sure.
10	MR. ROTHMAN: You want to read that back,
11	Ms. Schreiber?
12	(Court Reporter Read Back.)
13	THE WITNESS: No.
14	BY MR. ROTHMAN:
15	Q Does TEG currently have source code for any
16	version of Haptic Federal developed by Max?
17	MR. DELANEY: Object to the form of the
18	question. You can answer.
19	THE WITNESS: The co-developed co-created
20	software we currently have Haptic.
21	BY MR. ROTHMAN:
22	Q Where is that software source code?
23	A I have to refer to specific
24	MR. DELANEY: You have to restate the
25	question. It came in jumbled.

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1	his attitude for sure.
2	Q Okay. Well, we have a disagreement about
3	that. But as long as we both understand what that
4	disagreement is, we can move forward with the
5	deposition.
6	So my question is, when was it that TEG
7	first received my client's source code and then
8	retained the source code not destroyed?
9	MR. DELANEY: Objection to the form of the
10	question. Calls for a legal conclusion.
11	BY MR. ROTHMAN:
12	Q You can answer.
13	A I would break your question into two parts.
14	Q Sure.
15	A We first received the software that we were
16	co-developing in July, approximately of 2020.
17	The second part of your question, I don't
18	know the answer to that.
19	Q Okay. So do you understand the difference
20	between source code and what you are referring to as
21	software?
22	A I know what source code is, yes.
23	Q Okay. So my question refers to source
24	code. And the question is when did TEG first receive
25	source code from my client?

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